Element Performance Inspection (EPI) Data Collection Tool
7.2.1 Safety Program (Ground and Flight) (OP)

ELEMENT SUMMARY INFORMATION

Purpose of this Element (certificate holder's responsibility):

- To ensure a comprehensive and effective Safety Program (Ground and Flight) is established and maintained to the highest possible degree of safety.

Objective (FAA oversight):

- To determine if the certificate holder follows its procedures, controls, process measurements, and interfaces for the Safety Program (Ground and Flight).

- To determine if there were any changes in the personnel identified by the certificate holder as having responsibility and/or authority for the Safety Program (Ground and Flight).

Specific Instructions:

- To accomplish this EPI, the inspector should familiarize himself/herself with the Safety Program (Ground and Flight).

Related EPIs:

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SUPPLEMENTAL INFORMATION

Specific Regulatory Requirements (SRRs):

- SRRs:
  119.65(a)
  119.65(a)(1)
  119.65(d)
  119.65(e)(1)
  119.65(e)(2)
  119.65(e)(3)
  121.135(a)(1)
  121.135(b)(1)
  121.135(b)(2)
  121.135(b)(3)

Related CFRs & FAA Policy/Guidance:

- Related CFRs:
  Intentionally left blank

- FAA Policy/Guidance:
  Title 49 USC, subtitle VII, part A, chapter 447, paragraphs 44701 and 44702
  FAA Order 8740.1D
  HBAT 99-19
  HBAT 00-08
  HBAW 00-07

- FAA Policy/Guidance:
    AC 120-66B
    AC 00-58
    AC 120-59

EPI SECTION 1 - PERFORMANCE OBSERVABLES

Objective: (FAA oversight responsibility): The tasks and questions in this section of the data collection tool (DCT) are designed to assist the inspector in determining if the certificate holder follows its written procedures and controls and meets the established performance measures of the process. To accomplish this, questions have been generated to test both the outputs of the process as well as the process itself. Question 1 and its following subquestions are directed at the output(s) of the process, whereas questions 2-6, when answered, should be directed at the process itself.

Tasks

	To meet this objective, the inspector must accomplish the following tasks:
1.	Review the information listed in the Supplemental Information section of this DCT.
2.	Review the policies, procedures, instructions, and information for the Safety Program (Ground and Flight) contained in the certificate holder's manual.
3.	Review the associated safety attribute inspection (SAI) for this element with emphasis on the controls, process measurements, and interface attribute sections.
4.	Observe the Safety Program (Ground and Flight) to gain an understanding of the procedures, instructions, and information contained in the certificate holder's manual.
5.	Discuss the Safety Program (Ground and Flight) with the personnel (other than management) who perform the duties and responsibilities required by the program.

Questions

	To meet this objective, the inspector must answer the following questions:	
1.	Determine whether the following performance measures were met:	
1.1.	Did the safety incident/accident reporting system provide reports as specified by the certificate holder's Safety Program (Ground and Flight)? *Related Performance JTIs:* 1. Check at the FAA or Air Carrier specified Location to determine that the Certificate Holder's manual system includes procedures specifying how safety program elements have been developed, properly integrated, and coordinated throughout the air carrier, including a safety incident/accident reporting system. *Sources:* HBAT 99-19 (4)(A)(2)(a)	☐ Yes ☐ No, Explain
1.2.	Were all accidents/incidents investigated in a timely manner? *Related Performance JTIs:* 1. Check at the FAA or Air Carrier specified Location to determine that the Certificate Holder's manual system includes procedures specifying how safety program elements have been developed, properly integrated, and coordinated throughout the air carrier, including accident/incident investigations. *Sources:* HBAT 99-19 (4)(A)(2)(b)	☐ Yes ☐ No, Explain
1.3.	Were safety audits/inspections conducted as specified by the certificate holder's Safety Program (Ground and Flight)? *Related Performance JTIs:* 1. Check at the FAA or Air Carrier specified Location to determine that the Certificate Holder specifies that the primary objectives of a safety	☐ Yes ☐ No, Explain

		program should be to motivate safe actions through establishment of a dynamic corporate safety culture; identify hazards to safe operations; work with other company departments to develop and implement safety interventions; monitor intervention strategies to validate effectiveness; and communicate the results throughout the air carrier in accordance with the Certificate Holder's design. *Sources:* HBAT 99-19 (3)(C)	
	2.	Check at the FAA or Air Carrier specified Location to determine that the Certificate Holder's manual system includes procedures specifying how safety program elements have been developed, properly integrated, and coordinated throughout the air carrier, including safety audits and inspections. *Sources:* HBAT 99-19 (4)(A)(2)(c)	
1.4.		Was an Internal Evaluation Program (IEP) used? *Related Performance JTIs:*	☐ Yes ☐ No, Explain
	1.	Check at the FAA or Air Carrier specified Location to determine that the Certificate Holder's manual system includes procedures specifying how safety program elements have been developed, properly integrated, and coordinated throughout the air carrier. *Sources:* HBAT 99-19 (4)(A)(2)	
	2.	Check at the FAA or Air Carrier specified Location to determine that the Certificate Holder's manual system includes procedures specifying how safety program elements have been developed, properly integrated, and coordinated throughout the air carrier, including a safety incident/accident reporting system. *Sources:* HBAT 99-19 (4)(A)(2)(a)	
	3.	Check at the FAA or Air Carrier specified Location to determine that the Certificate Holder's manual system includes procedures specifying how safety program elements have been developed, properly integrated, and coordinated throughout the air carrier, including an internal evaluation program. *Sources:* HBAT 99-19 (4)(A)(2)(d)	
1.5.		Was an Operational Risk Assessment Program used? *Related Performance JTIs:*	☐ Yes ☐ No, Explain
	1.	Check at the FAA or Air Carrier specified Location to determine that the Certificate Holder has a safety department that addresses the broad range of risks involved in commercial aviation to include, but not limited to, flight, maintenance, and ground safety in accordance with the Certificate Holder's design. *Sources:* HBAT 99-19 (3)(B)	
	2.	Check at the FAA or Air Carrier specified Location to determine that the Certificate Holder's manual system includes procedures specifying how safety program elements have been developed, properly integrated, and coordinated throughout the air carrier. *Sources:* HBAT 99-19 (4)(A)(2)	
	3.	Check at the FAA or Air Carrier specified Location to determine that the Certificate Holder's manual system includes procedures specifying how safety program elements have been developed, properly integrated, and coordinated throughout the air carrier, including an operational risk assessment program.	

	Sources: HBAT 99-19 (4)(A)(2)(e)	

1.6.	Did the Operational Risk Assessment Program include one of the risks such as flight, maintenance, or ground safety?
	
	Related Performance JTIs:
	
	1. Check at the FAA or Air Carrier specified Location to determine that the Certificate Holder has a safety department that addresses the broad range of risks involved in commercial aviation to include, but not limited to, flight, maintenance, and ground safety in accordance with the Certificate Holder's design.
	     Sources: HBAT 99-19 (3)(B)
	
	2. Check at the FAA or Air Carrier specified Location to determine that the Certificate Holder's manual system includes procedures specifying how safety program elements have been developed, properly integrated, and coordinated throughout the air carrier.
	     Sources: HBAT 99-19 (4)(A)(2)
	
	3. Check at the FAA or Air Carrier specified Location to determine that the Certificate Holder's manual system includes procedures specifying how safety program elements have been developed, properly integrated, and coordinated throughout the air carrier, including an operational risk assessment program.
	     Sources: HBAT 99-19 (4)(A)(2)(e)
	
	4. Check at the FAA or Air Carrier specified Location to determine the Certificate Holder includes procedures to provide service with the highest possible degree of safety in the public interest in accordance with the Certificate Holder's design.
	     Sources: Title 49 USC, Subtitle VII, Part A, Subpart iii, Chapter 447, Paragraph 44701
	
	5. Check at the FAA or Air Carrier specified Location to determine the Certificate holder specifies how the safety program will assign, maintain, and enhance safety and security as the highest priorities in air commerce in accordance with the Certificate Holder's design.
	     Sources: Title 49 USC, Subtitle VII, Part A, Subpart I, Chapter 401, Paragraph 40101
		☐ Yes
		☐ No, Explain

1.7.	Was an Open Reporting System (i.e., evaluation of employee/contractor generated safety concerns, deficiency reports, and improvement recommendations) used?
	
	Related Performance JTIs:
	
	1. Check at the FAA or Air Carrier specified Location to determine that the Certificate Holder's manual system includes procedures specifying how safety program elements have been developed, properly integrated, and coordinated throughout the air carrier, including open reporting systems.
	     Sources: HBAT 99-19 (4)(A)(2)(f)
	
	2. Check at the FAA or Air Carrier specified Location to determine that the Certificate Holder has an Aviation Safety Action Program intended to create a non-threatening environment to encourage the employee to voluntarily report safety issues even though they may involve a violation in accordance with the Certificate Holder's design.
	     Sources: HBAT 00-08(1)
		☐ Yes
		☐ No, Explain

1.8.	Were the identified safety concerns communicated to the appropriate parties to prevent those concerns from recurring?	☐ Yes ☐ No, Explain
	Related Performance JTIs:	
	1. Check at the FAA or Air Carrier specified Location to determine that the Certificate Holder specifies that the primary objectives of a safety program should be to motivate safe actions through establishment of a dynamic corporate safety culture; identify hazards to safe operations; work with other company departments to develop and implement safety interventions; monitor intervention strategies to validate effectiveness; and communicate the results throughout the air carrier in accordance with the Certificate Holder's design.	
	Sources: HBAT 99-19 (3)(C)	
	2. Check at the FAA or Air Carrier specified Location when the Certificate Holder detects a violation it expeditiously discloses it to the FAA, and takes prompt corrective action to ensure that the same or similar violation does not recur in accordance with the Certificate Holder's design.	
	Sources: AC 00-58	
	3. Check at the FAA or Air Carrier specified Location that the Certificate Holder includes procedures to identify and resolve safety related issues in accordance with the Certificate Holder's design.	
	Sources: AC 120-59	
1.9.	Were routine monitoring and trend analysis programs used?	☐ Yes ☐ No, Explain
	Related Performance JTIs:	
	1. Check at the FAA or Air Carrier specified Location to determine that the Certificate Holder's manual system includes procedures specifying how safety program elements have been developed, properly integrated, and coordinated throughout the air carrier, including routine monitoring and trend analysis programs.	
	Sources: HBAT 99-19 (4)(A)(2)(g)	
1.10.	Were results from external evaluation programs reviewed?	☐ Yes ☐ No, Explain
	Related Performance JTIs:	
	1. Check at the FAA or Air Carrier specified Location to determine that the Certificate Holder's manual system includes procedures specifying how safety program elements have been developed, properly integrated, and coordinated throughout the air carrier, including review of external evaluation programs.	
	Sources: HBAT 99-19 (4)(A)(2)(h)	
1.11.	Did the safety committee meet as specified by the certificate holder's Safety Program (Ground and Flight)?	☐ Yes ☐ No, Explain
	Related Performance JTIs:	
	1. Check at the FAA or Air Carrier specified Location to determine that the Certificate Holder's manual system includes procedures specifying how safety program elements have been developed, properly integrated, and coordinated throughout the air carrier, including Safety Committee(s).	
	Sources: HBAT 99-19 (4)(A)(2)(i)	
	2. Check at the FAA or Air Carrier specified Location that the Certificate Holder includes procedures to identify and resolve safety related issues	

		in accordance with the Certificate Holder's design. *Sources:* AC 120-59	
1.12.		Was the emergency response plan current?	☐ Yes ☐ No, Explain
1.13.		Were employees/contractors provided with safety awareness information? *Related Performance JTIs:* 1. Check at the FAA or Air Carrier specified Location to determine that the Certificate Holder specifies that the primary objectives of a safety program should be to motivate safe actions through establishment of a dynamic corporate safety culture; identify hazards to safe operations; work with other company departments to develop and implement safety interventions; monitor intervention strategies to validate effectiveness; and communicate the results throughout the air carrier in accordance with the Certificate Holder's design. *Sources:* HBAT 99-19 (3)(C)	☐ Yes ☐ No, Explain
1.14.		Were employees/contractors provided with safety education? *Related Performance JTIs:* 1. Check at the FAA or Air Carrier specified Location that the Certificate Holder collects safety data, which will be analyzed to develop corrective actions for identified safety concerns and to educate the appropriate parties, to prevent a reoccurrence of the same type of safety event in accordance with the Certificate Holder's design. *Sources:* AC 120-66B 2. Check at the FAA or Air Carrier specified Location to determine the Certificate holder specifies how elements that should be considered in an Air Carriers safety program should include an active Aviation Safety Education Program in accordance with the Certificate Holder's design. *Sources:* Order 8740.1D Chapter 16, Section 1, 3. A.(6)	☐ Yes ☐ No, Explain
1.15.		Was the Director of Safety qualified for the position? *Related Performance JTIs:* 1. Check at the FAA or Air Carrier specified Location for the operations specifications (A006) and the management resume to verify that the Certificate Holder has a qualified person serving full time in the position or equivalent position of Director of Safety (DOS) in accordance with the Certificate Holder's design. *Sources:* 119.65(a)(1)	☐ Yes ☐ No, Explain
1.16.		Was the size and scope of the safety structure appropriate to the certificate holder? *Related Performance JTIs:* 1. Check at the FAA or Air Carrier specified Location to determine that the Certificate Holder specifies how the safety program shall include a safety structure and staff that is appropriate to the size of the operator, the kind and scope of operations, and the type and number of aircraft used in its operations carrier in accordance with the Certificate Holder's design. *Sources:* HBAT 99-19 (4)(A)(1)	☐ Yes ☐ No, Explain

2.	Were the certificate holder's policies, procedures, instructions, and information, contained in its manual for the Safety Program (Ground and Flight), followed?	☐ Yes ☐ No, Explain
3.	Were the Safety Program (Ground and Flight) controls followed?	☐ Yes ☐ No, Explain
4.	Did the records for the Safety Program (Ground and Flight) comply with the instructions provided in the certificate holder's manual?	☐ Yes ☐ No, Explain
5.	Were the process measurements for the Safety Program (Ground and Flight) effective in identifying problems or potential problems and providing corrective action for them?	☐ Yes ☐ No, Explain
6.	Did personnel properly handle the associated interfaces by complying with other written policies, procedures, instructions, and information that are related to this element?	☐ Yes ☐ No, Explain

EPI SECTION 1 - PERFORMANCE OBSERVABLES Drop-Down Menu
1. Personnel.
2. Tools and Equipment.
3. Technical Data.
4. Procedures, policies or instructions or information.
5. Materials.
6. Facilities.
7. Controls.
8. Process Measures.
9. Interfaces.
10. Desired Outcome.
11. Other.

EPI SECTION 2 - MANAGEMENT RESPONSIBILITY & AUTHORITY OBSERVABLES

Objective: The questions in this section address the responsibility and authority of the process. They are designed to assist the inspector in determining if there is a clearly identifiable, qualified, and knowledgeable, person who is responsible for the process, is answerable for the quality of the process, and has the authority to establish and modify the processand recognizes that responsibility and/or authority. (The person with the authority may or may not be the person with the responsibility.)

Tasks

	To meet this objective, the inspector must accomplish the following tasks:
	NOTE: If no personnel or major program changes (as defined by the principal inspector (PI)) affecting the responsibility or authority attributes for this element have occurred since the last SAI and/or EPI was accomplished, then do not perform tasks 3-6, below. Answer questions 1 and 2, below, and provide the name/title.
1.	Identify the person who has overall responsibility for the Safety Program (Ground and Flight).
2.	Identify the person who has overall authority for the Safety Program (Ground and Flight).
3.	Review the duties and responsibilities for the person(s) who manage the Safety Program (Ground and Flight) documented in the certificate holder's manual.
4.	Review the appropriate organizational chart.
5.	Discuss the Safety Program (Ground and Flight) with the management personnel identified in tasks 1 and 2.
6.	Evaluate the qualifications and work experience of the management personnel identified in tasks 1 and 2.

Questions

	To meet this objective, the inspector must answer the following questions:	
1.	Is there a clearly identified person who is responsible for the quality of the Safety Program (Ground and Flight)?	☐ Yes ☐ No, Explain Name/Title:
2.	Is there a clearly identified person who has authority to establish and modify the certificate holder's policies, procedures, instructions, and information for the Safety Program (Ground and Flight)?	☐ Yes ☐ No, Explain Name/Title:
3.	Does the responsible person know that he/she has responsibility for the Safety Program (Ground and Flight)?	☐ Yes ☐ No, Explain ☐ No Change
4.	Does the person with authority know that he/she has authority for the Safety Program (Ground and Flight)?	☐ Yes ☐ No, Explain ☐ No Change
5.	Does the person with responsibility for the Safety Program (Ground and Flight) meet the qualification standards?	☐ Yes ☐ No, Explain ☐ No Change
6.	Does the person with authority to establish and modify the Safety Program (Ground and Flight) meet the qualification standards?	☐ Yes ☐ No, Explain ☐ No Change

7.	Does the person with responsibility understand the controls, process measurements, and interfaces associated with the Safety Program (Ground and Flight)?	☐ Yes ☐ No, Explain ☐ No Change
8.	Does the person with authority understand the controls, process measurements, and interfaces associated with the Safety Program (Ground and Flight)?	☐ Yes ☐ No, Explain ☐ No Change
9.	Does the responsible person know who has authority to establish and modify the Safety Program (Ground and Flight)?	☐ Yes ☐ No, Explain ☐ No Change
10.	Does the individual with authority know who has the responsibility for the Safety Program (Ground and Flight)?	☐ Yes ☐ No, Explain ☐ No Change

EPI SECTION 2 - MANAGEMENT RESPONSIBILITY & AUTHORITY OBSERVABLES Drop-Down Menu
1. Assignment of responsibility.
2. Assignment of authority.
3. Does not understand procedures, policies or instructions and information.
4. Does not understand controls.
5. Does not understand process measurements.
6. Does not understand interfaces.
7. Span of control.
8. Position vacant.
9. Other.